

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA,  Plaintiff,  vs.  RODE WAYNE VOCU,  Defendant.	) ) ) ) ) ) )	Criminal No. 1:19-CR-086  <b>MOTION TO RECONSIDER ORDER OF DETENTION</b>
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The Defendant, Rode Wayne Vocu, moves the Court for an order releasing him so that he may attend residential treatment at Amity's Circle Tree Ranch in Tucson, Arizona.

Since his detention hearing Mr. Vocu has been accepted at Amity's Circle Tree Ranch treatment facility. *See Exhibit 1.* Vocu understands the requirements, expectations, and obligations of participating in the program. If released, he agrees to comply with whatever conditions the Court requests. He also agreed to abide by the program's rules and regulations.

Mr. Vocu is detained at the Heart of America Correctional and Treatment Center, Rugby, North Dakota. Arrangements will be made by Amity's Circle Tree Ranch to get Mr. Vocu to their facility. A bed is currently available for Mr. Vocu as soon as he is released.

Therefore, Mr. Vocu requests the Court issue an order releasing him from custody as soon as possible so that he may reside at the Amity's Circle Tree Ranch.

Dated this 28<sup>th</sup> day of June, 2023.

Respectfully submitted,

JASON J. TUPMAN  
Federal Public Defender  
By:

/s/ Scott Rose  
Scott Rose  
Assistant Federal Public Defender  
Attorney for Defendant  
Office of the Federal Public Defender  
Districts of South Dakota and North Dakota  
100 West Broadway Ave, Ste 230  
Bismarck, ND 58501  
Telephone: 701-250-4500 Facsimile: 701-250-4498  
filinguser\_SDND@fd.org